

**TESTIMONY OF LAURIE DISHMAN
BEFORE
SUBCOMMITTEE ON COAST GUARD AND MARITIME
TRANSPORTATION**

"Crimes Against Americans On Cruise Ships"

**HEARING SCHEDULED
Tuesday, March 27, 2007 -- 10:00 a.m.
Rayburn House Office Building
Room # 2167**

**Laurie Dishman
5331 Carmen Way
Sacramento, California 95822**

Tel. No. (916) 731-8142

Statement of Laurie Dishman - Sacramento, California

Hello, I would like to thank the Chairman, the Committee and my Congresswoman, Doris Matsui, for inviting me to testify today. Although this is a difficult process, it is important for me to share my experiences of the last year, since my cruise on a Royal Caribbean cruise ship.

I am 36 years old and was born and raised in Sacramento, CA. I have a close family - a very loving mother and father, two sisters, and a brother. My father is here today; the rest of my family, including my mom, are at work and unfortunately, can't be here.

I am employed as a Food Service Manager for Raley's Superstores in Northern California. I have been with Raley's for 18 years. My job is very important to me. I supervise approximately thirty-five employees. Everyday, I work very hard to have my colleagues give world class service to each and every customer who walks into our store.

In February 2006, I took a break from work to take a cruise. My best friend Michelle and I wanted to celebrate 30 years of friendship. We decided to go to Disneyland and then sail on a Royal Caribbean cruise to the Mexican Riviera, so we could also celebrate my birthday on the cruise ship.

On February 21, 2006, a Royal Caribbean security guard raped me in my cabin. I woke up with soreness around my neck and throat. To my horror, there were ligature marks on my neck. My tampon was impacted into me during the rape while I was unconscious. I felt humiliated. I could not believe what had happened.

I later learned that the "security guard" was actually a janitor. He was just "filling in" for security in the lounges to check I.D.s because there were not enough security personnel on board. I learned that there are only two or three legitimate security guards and a supervisor on duty at night, and it is impossible for them to patrol the entire ship. I also learned that the janitor had an

employee history which included lying, falsification of records, insubordination, and anger management problems. Yet, he was assigned to work in the lounge "checking I.D.s." Even worse, he was assigned to work with another janitor whose background included lying, falsification of records, and drinking during working hours. Witnesses observed these two men drinking beer in the lounge before the rape. We have also learned that Royal Caribbean bartenders knowingly served other alcohol to the crew member who raped me, even though he was wearing a security badge.

Michelle called the purser's desk shortly after 9:00 a.m., when I awoke, to report what had happened. We needed help, but we were afraid of security personnel showing up because I had been raped by a security guard.

A security officer appeared in our cabin, together with another man, who I understood was the head purser. They sat on the bed where the rape occurred. We told them what happened, but they insisted that we prepare written statements and sign them. They left without either taking us to the infirmary or securing the cabin. The security officer returned, and told us we had to complete the statements before we could go to the doctor.

After noon (12:00 p.m.), the security officer took us to the ship infirmary. The ship doctor told us to take two large garbage bags and go back to the cabin and collect evidence of the rape. Michelle and I went and gathered what we thought they needed. We tried to preserve hair and other evidence by carefully folding the sheets and the pillow case and placing them into the bags. It was horrible to do this. Michelle and I felt humiliated carrying the bags in the public hallways and into the elevator with the security officer watching us. When we returned to the infirmary, we watched as the nurses took everything out of the trash bags, unfolding the sheets in the process, and put everything into other bags. It was painful to watch this.

The ship doctor performed the rape kit and examined my neck. After the doctor visit, we were returned to the cabin. I felt afraid to be in the cabin. Michelle took me to a corner of the pool/solarium area, and put a towel around me.

I wore sunglasses hoping no one would recognize me. I wanted to go home. There was no security to protect me; although, quite frankly, I would have been frightened to have another Royal Caribbean "security" man around me. I just wanted to go home and see my parents.

Michelle kept asking for a new cabin as the day wore on. We were finally given another cabin late in the day, and were told to take some of our personal items from the cabin. Late that same day the security officer said that he would lock the cabin so that no one could get in.

I identified the rapist by a photograph. Michelle and I met with the officers, all men, in an office. We were told that I had three options: (1) getting off the ship the next morning at port in Cabo and reporting the crime to the Mexican police, or (2) staying on the ship and talking to the FBI at the end of the cruise, or (3) flying back to Los Angeles and reporting it to the FBI. I wanted to go home because I felt afraid. The officer told us that the crew member was told to stay on his floor, and that they would respond if he came back to passenger decks. This made me even more afraid. He was never arrested, or "placed in the brig," or had a guard assigned to him during the cruise.

The following morning, the cruise line arranged for us to fly back to Los Angeles. The FBI interviewed us. They photographed my neck to document the bruises. When the cruise ship returned to port on February 26, 2006, the FBI agents boarded the ship. The FBI file which we eventually obtained (70% of which is missing) indicates that 10 agents boarded the ship. The FBI file indicates that they inspected my cabin early in the morning, as well as the assailant crew member's cabin (which remained unsecured the entire cruise). The FBI eventually interviewed the crew member at noon. It is my understanding that he denied ever going into my cabin. The FBI did not arrest the crew member and he continued to work on the ship. He sailed with the ship when it left San Pedro/L.A. on February 26th with a new group of passengers to prey upon!

My FBI victim's specialist later informed me in a letter that the FBI/DOJ decided to decline prosecution of my case on February 26, 2006, the same day

that the cruise ship returned to port. A copy is attached. They never even tested my blood to see if there were date rape drugs in it. The FBI agent who called me said that there was not enough evidence and that it was a "he-said/she-said" case. We have requested my blood sample and photographs of my injuries, filed a FOIA request and called and written to the FBI, but the FBI will not cooperate. We can't obtain my blood sample to test it, or the photographs of the bruises around my throat, or the statements of the rapist, etc.

I later learned that the cruise line lawyers met with the assailant after they boarded the cruise ship on February 26, 2006. They boarded the ship shortly after 7:00 a.m. The FBI did not interview the assailant until noon. The cruise line lawyers continued to meet with him the next day when they took his statement for three hours. Unfortunately, the cruise line refuses to provide us with any of his statements because they were taken, according to the cruise line, to defend themselves in any lawsuit I might file. This seems strange because the last thing I was thinking about was a lawsuit.

I also recently learned that on February 28, 2006, two days after the ship returned to port, the crew member was terminated after he changed his story. After meeting with the defense lawyers, he characterized the incident as a consensual encounter. Only then did the Captain of the ship finally place the rapist "in isolation" and terminate him. They flew him back to Trinidad.

At this point, we don't know when the FBI learned that he changed his story. The FBI refuses to provide us with most of their file materials, and we are still trying to piece things together. But what we did learn was that on March 3, 2006, five days after the FBI left the ship and three days after the crew member was terminated, the FBI agent decided to request a polygraph of the assailant. Unfortunately, by that time, the crew member was safely back in his home country courtesy of the cruise line. Did the cruise line tell the FBI this was happening? No one will tell us at this point. But if the FBI had performed the polygraph in a timely manner, on February 26th, they would know that this is not a "he-said/she-said" case at all - they would then know that it is a "he-lied" case. Instead, both the FBI and the cruise line subjected other women passengers on the next cruise to the danger posed by this rapist.

I requested meetings with the FBI and the DOJ. I went by myself, which was very hard because I had to return to Los Angeles where this nightmare began. They told me that there were no witnesses and not enough evidence, but they really didn't want to talk about the evidence which did exist. They said if he were to rape someone again my case could be used against him. I asked for the name of the crew member, his address, whether he had been terminated and, if so, where he was. The FBI told me that this information was confidential. I learned nothing in meeting with the FBI/DOJ.

Thomas O'Brien, the senior federal prosecutor in Los Angeles, was present during the FBI/DOJ meeting. He also said that there was not enough evidence to criminally prosecute the crew member. I told him that I am your best evidence. I asked him whether the Los Angeles FBI ever had a successful investigation into a crime on a Royal Caribbean cruise ship which led to jail time. He said that he was not prepared for that question. Everyone in the room either looked down or looked at each other and shrugged their shoulders. I am still waiting for an answer to whether any criminal on a Royal Caribbean cruise ship has been convicted of a sexual assault. The answer to that question should explain why there is no justice in my case, and why I am here today speaking on this topic.

The nicest thing that I can say about the meeting is that Mr. O'Brien encouraged me to seek justice in a civil case, and to pursue this with Congress. Here I am!

My experiences with this cruise line since the crime have been just as awful as my experiences on the cruise ship.

Within a week of the cruise, I received a telephone call from a woman from the cruise line. She did not identify the department she worked in. I intuitively was not comfortable at this point in speaking with her. I later learned that she works for "risk management" settling claims of crime and accident victims and requiring the victims to sign confidentiality agreements. I am so glad that I didn't talk to her at length. Instead, I asked her to communicate through my FBI victim's specialist. I never heard from her again.

I retained a maritime lawyer who wrote many letters to the cruise line starting in the third week of March 2006. He requested my medical records, information regarding the crew member, and information about whether the crew member had any type of sexually transmitted diseases or HIV/AIDS. He also requested that the cruise line keep all tapes from all ship security cameras. The cruise line provided no information, even though multiple letters were sent to the President of the cruise line, Adam Goldstein, and to "risk management."

I later read a transcript of the hearing on cruise ship safety in mid March 2006 where Royal Caribbean promised under oath to Congressman Christopher Shays that they would cooperate with victims and provide information. Did they forget about my crime a few weeks earlier?

In June, the cruise line lawyers contacted my lawyer and, in the first conversation, offered to make a settlement offer provided that I sign a confidentiality agreement. My attorney understood my goal was to obtain information and justice and refused the offer. The cruise line still did not produce any information.

The only things I received from Royal Caribbean were solicitations to buy another cruise. The first communication was an e-mail from the marketing department:

Dear Laurie:

Welcome home and thank you again, for sailing with Royal Caribbean International. *The great thing about a Royal Caribbean cruise is that no two days are ever alike. It's a new adventure every day*

. . .

The next letter was from the president, Adam Goldstein:

Dear Laurie:

On behalf of the staff and crew of *Vision of the Seas*, I'd like to thank you for sailing with us *and giving us the opportunity to send you home with an experience to remember*. With over 100 ports of call worldwide, we pride ourselves on bringing you adventure around

every corner.

You can expect just as many memorable experiences on your next Royal Caribbean cruise vacation . . .

My attorney insisted that these letters stop. Shortly thereafter, I received another one from a senior Vice President soliciting me to buy another cruise for "*another amazing vacation adventure . . .* "

My attorney had two more conversations with the cruise line lawyers asking them to provide the requested information. The cruise line ignored the requests and again offered to make a settlement offer with a confidentiality agreement prohibiting me from mentioning the crime to anyone again.

By July/August of last year, I was fed up. I proceeded with a civil lawsuit to obtain the answers which the cruise line refused to voluntarily provide. By this time, I had met and/or corresponded with my Congresswoman and Senator and/or their staff. Since then, I have also met with other members of Congress and the Judiciary and Commerce committees and their staff, and I greatly appreciate their time and concern.

I have also taken my cause to the newspapers and television, because the public needs to know about the issue of cruise ship crime and the way this cruise line responds to crimes. The public also needs to know that the FBI will not prosecute crimes in most cases, nor will they be square with you.

The cruise line has not been happy that I didn't agree to a confidential settlement and then disappear. This is how they treated me:

On August 1, 2006, my Congresswoman wrote a letter to President Goldstein at the cruise line requesting the information I had been seeking. At this point, I had received nothing but solicitations. The response by the cruise line was to attack me and attempt to dupe my Congresswoman. First, the cruise line lawyers sent my medical records (which they had since February) to us in mid-

August, together with my statement and the assailant's personnel file.

Thereafter, Royal Caribbean issued a press statement from their Director of Corporate Communications, Michael Sheehan, claiming that they "immediately"

- * notified the FBI,
- * provided medical attention,
- * sealed off the cabin, and
- * then provided me with information.

These statements are false. In truth:

- * the cruise line delayed notifying the FBI (verbally) until either later that evening or the following morning. The officers were still offering to put me off in Cabo as an option late in the day. The FBI did not receive written notice until the following morning.

- * the cruise line delayed medical treatment until after I completed the statements demanded by security and after I was sent back to the cabin to gather evidence.

- * the cruise line delayed sealing my cabin until late afternoon that day and only after the officers sat on the bed, after we were required to collect evidence, and after we left the cabin late that day to go to another cabin.

- * the only "information" (my medical records, statements and the assailant's personnel file) was sent shortly before the cruise line's press statement.

On August 21, the cruise line's Vice President of Government Relations, Joe Fox, wrote a mean-spirited letter to my Congresswoman which placed me in a false light. He claimed that I reported the crime on February 23rd, which is not true

because I reported it on February 21. His claims that they "immediately" reported the crime, provided medical treatment, and sealed the cabin were a re-hash of the false press statement. It is ironic that Mr. Fox would write such a letter. I subsequently learned that he was the one who sent the letter to the Congressional hearing representing that there were 66 sexual assaults on the Royal Caribbean ships for the period 2003 - through 2005. Recently, the LA Times reported that, in actuality, there were several hundred sexual crimes during this time period.

Also, very disturbing was an article which was published on August 24 in a cruise newspaper, Cruise News Daily, which made fun of my search for justice. Its tone was disrespectful. I could not imagine how anyone could be so mean to a rape victim. My lawyer suspected that the cruise line planted the story to embarrass me. He sent a request to Royal Caribbean to produce copies of e-mails between the cruise newspaper and the cruise line. Royal Caribbean objected. The Court ordered the documents to be produced. The cruise line delayed, and my lawyer filed another motion. Finally, the cruise line produced some of the e-mails. Here is a part of the exchange between the editor of Cruise News Daily and Royal Caribbean Corporate Communication Director, Michael Sheehan, on August 17, 2006:

Cruise News Daily: **"I really want to nail this woman - and the ICV [International Cruise Victims]."**

Royal Caribbean: **"Let's see what we can do tomorrow!!!!!!!!!!!!"**

A copy is attached.

Shortly after this email exchange and an "interview" with Mr. Sheehan, the cruise newspaper published an article mocking me, based on the misleading information from Royal Caribbean.

I also just recently learned that the tapes of the security cameras were

allegedly "re-used" and taped over, even though the security officer acknowledged that they were important evidence and were not to be removed from the security office.

There is something terribly wrong with this cruise line. Three guards to patrol an entire ship? Janitors masquerading as security guards and drinking in the lounge? CCTV tapes conveniently "re-used?" Cruise line lawyers meeting with the assailant, and his story changes? The cruise line sends the assailant home, and three days later the FBI wants to do a polygraph test? "Risk management" keeping my medical records and information about the crime for six months until my Congresswoman intervened? A President of the cruise line who refuses to respond to requests for information for months? No convictions for rape in four decades? A Director of Corporate Communications of a major corporation maliciously plotting to "nail" a victim and a victim's organization?

During this one year journey, I have not seen any sign that the cruise line acknowledges the crime against me by their employee, or crimes against women in general on its ships. This is not to mention the dismal performance of the FBI and the lack of prosecutions and convictions.

I also heard that a senior FBI agent (no. 3 at the Bureau), Mr. Bald, joined this cruise line last June after being with the FBI for 29 years. I heard that he is a very nice man. But let's get real. Why would you expect things to change at the cruise line by hiring a senior agent from the same bureau whose investigations never convicted a single Royal Caribbean sexual predator during his entire FBI tenure? Mr. Bald was with the FBI when they mis-handled my case. Was he hired to improve security? Or to maintain the status quo, which has prejudiced crime victims for too, too long?

The cruise line controls the scene of the crime, the security, the security tapes, the witnesses, the evidence, the ship doctors, the victim's medical records, and the criminals themselves. Often, as in my case, the defense attorneys have access to witnesses even before the FBI. The law firm which is defending the cruise line in my case touts on its web page (www.mflegal.com) the ability to

immediately send it's "emergency response team" to the ships to represent the cruise line's interests and "to ensure management knows exactly what has transpired and what needs to be done." The cruise line lawyers also promise to "handle and resolve claims on the scene before they become inflamed and lead to costly litigation."

Who was looking out for my interests on the cruise ship following the crime? Who will look out for the interests of the next victim on a cruise ship?

We need your help in protecting the rights of victims of crime on cruise ships.

These are things that I, Laurie Dishman, would like to see happen to prevent crimes from happening out at sea, and to protect future crime victims from cruise line harassment:

To Prevent Crimes Against Passengers:

- * **Increased number of security guards.** The cruise ship I was on had only three guards working at night to police a small city of around 3,000. Janitors should not be permitted to masquerade as security guards.
- * **Closed Circuit Television ("CCTV") cameras in all lounges, foyers, elevators, stairwells, and crew and passenger hallways.** My store has cameras everywhere - why can't the cruise ships?
- * **Trained security personnel actually monitoring the CCTV.** The conspicuous placement and monitoring of the CCTV should be a deterrent. Security guards also can be dispatched to the scene if a crime is occurring or if crew members are observed drinking alcohol, harassing women, or sneaking into the passenger areas.
- * **Peep holes and chain locks for the doors.** All hotels have them - why not cruise ships?

- * **Background check on employees which cross reference whether they have been fired by other cruise lines.** Otherwise, the criminals go home for a little bit and then show up on another ship.
- * **The presence of U.S. Marshals or independent U.S. security personnel on the cruise ships.** Increasing the number of cruise security personnel alone will not eliminate the problem. There must be independent Federal or State law enforcement officials on the ships. Nothing will really get better with the fox guarding the hen house.

To Protect the Passengers After They Have Been Victimized:

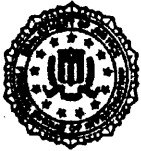
- * **CCTV must be preserved as evidence rather than destroyed, "lost," or "re-used" by the cruise line, which is the usual case.** (In my case, I asked about surveillance tapes while on the ship. My attorney requested the tapes many times. The security officer later testified that he labeled the tapes "confidential - do not remove." The cruise line claims that neither me, my cabin mate, nor the security guard were seen on 160 cameras - impossible! Eight months later the cruise line defense lawyers now claim that the tapes were allegedly "re-used." How convenient!)
- * **Placing the accused crew member in the brig until he has been interviewed by law enforcement.** (In my case, the crew member carried out his normal activities until the ship returned to port. He had five days to talk with other crew members and the cruise line lawyers to work up an alibi.)
- * **A woman counselor/nurse must be available for woman who are assaulted.** Women should not be forced to repeat their story to male officers over and over again in the middle of the ocean.
- * **A 1-800 number provided by RAINN (The Rape, Abuse, and Incest National Network which runs a sexual assault hotline to help victims and send rapists to jail) so that victims can learn of their rights and be professionally counseled.** (It is frightening to be at sea surrounded by male officers who are looking out for their own crew and not the victim!)
- * **An emergency telephone number for the U.S. consulate for all ports of**

call on the itinerary.

- * **A 1-800 number to the FBI.**
- * **A 1-800 number to the local police at the home port (Miami, Los Angeles, etc.) if the FBI doesn't respond.**
- * **A law permitting state law enforcement to investigate ship crimes, and local prosecutors to put the crew members in jail, because the FBI has such a poor record.**
- * **A law prohibiting the cruise line's lawyers from boarding the cruise ship and coaching the assailant crew members before the FBI completes its investigation.** (In my case, the cruise line lawyers boarded the ship shortly after 7:00 a.m. when the ship returned to port. They continued to meet with the crew member for several days thereafter. The crew member later changed his story from "I never went into the cabin" to the usual defense of "it was a consensual relationship.")
- * **A law applying HIPAA (the Health Insurance Portability & Accountability Act) to cruise ship doctors and nurses.** (In my case, the cruise line defense lawyers interviewed the doctor and, together with "risk management," reviewed my medical records without my approval and without having me execute HIPAA authorizations. The cruise line is now claiming that the neck injury and ligature marks I sustained during the rape are just "hickeys" - a term I have not heard since 7th grade! The cruise line should not be able to review a victim's medical records and place pressure on ship doctors to change their medical opinions.)
- * **A requirement that the cruise line provide all victims with a copy of their medical records when they disembark the ship.** (In my case, it was only after my lawyer filed a law suit and my Congresswoman intervened that the cruise line provided me with my medical records. It is unconscionable that a rape victim should have to go through this ordeal just to obtain her own medical records.)
- * **A law requiring the FBI to release a victim's blood samples, photographs of injuries and other similar evidence to the victim.** Whose side is the FBI on? The cruise lines and criminals have more rights.
- * **A Passenger "Bill of Rights," setting forth the above rights, which should be provided to each passenger before they board the cruise ship.**

In closing, I would like to mention Mr. Ken Carver, President of International Cruise Victims, who lost his daughter on a cruise ship owned by Royal Caribbean, and then battled their delay and cover-up. Thank you Ken for your courage and leadership!

Thank you again to this Committee for allowing me the honor of appearing in our Nation's Capitol. A special thank you to my Congresswoman, Doris Matsui, and her staff, who listened to me, and have made this most important hearing happen.



U.S. Department of Justice
Federal Bureau of Investigation
FBI - Los Angeles
Suite 1700, FOB
11000 Wilshire Boulevard
Los Angeles, CA 90024
Phone: (310) 996-3529
Fax: (310) 996-3564

April 11, 2006

Laurie Dishman
5331 Carmen Way
Sacramento, CA 95822

Re: Case Number: 45-LA-243958

Dear Laurie Dishman:

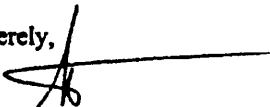
Your name was referred to the FBI's Victim Assistance Program as being a possible victim of a federal crime. We appreciate your assistance and cooperation while we are investigating this case. We would like to make you aware of the victim services that may be available to you and to answer any questions you may have regarding the criminal justice process throughout the investigation. Our program is part of the FBI's effort to ensure the victims are treated with respect and are provided information about their rights under federal law. These rights include notification of the status of the case. The enclosed brochures provide information about the FBI's Victim Assistance Program, resources and instructions for accessing the Victim Notification System (VNS). VNS is designed to provide you with information regarding the status of your case.

This letter is to provide you with updates to the case by which you were previously referred to the FBI's Victim Assistance Program. On February 26, 2006, we were informed by the United States Attorney's Office that they had declined your case for prosecution.

The Victim Notification System (VNS) is designed to provide you with direct information regarding the case as it proceeds through the criminal justice system. You may obtain current information about this matter on the Internet at WWW.Notify.USDOJ.GOV or from the VNS Call Center at 1-866-DOJ-4YOU (1-866-365-4968) (TDD/TTY: 1-866-228-4619) (International: 1-502-213-2767). In addition, you may use the Call Center or Internet to update your contact information and/or change your decision about participation in the notification program. If you update your information to include a current email address, VNS will send information to that address. You will need the following Victim Identification Number (VIN) '1341282' and Personal Identification Number (PIN) '4211' anytime you contact the Call Center and the first time you log on to VNS on the Internet. In addition, the first time you access the VNS Internet site, you will be prompted to enter your last name (or business name) as currently contained in VNS. The name you should enter is Dishman.

If you have additional questions which involve this matter, please contact the office listed above. When you call, please provide the file number located at the top of this letter. Please remember, your participation in the notification part of this program is voluntary. In order to continue to receive notifications, it is your responsibility to keep your contact information current.

Sincerely,


Sergio Mendez
Victim Specialist

IN THE CIRCUIT COURT OF THE 11TH
JUDICIAL CIRCUIT IN AND FOR
MIAMI-DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO. 06-15089 CA 04

LAURIE DISHMAN,

Plaintiff,

vs.

ROYAL CARIBBEAN CRUISES, LTD.,
A Liberian Corporation

Defendants.

**DEFENDANT, ROYAL CARIBBEAN CRUISES, RESPONSE TO PLAINTIFF'S
SECOND REQUEST FOR PRODUCTION PURSUANT TO COURT ORDER**

Defendant, ROYAL CARIBBEAN CRUISES LTD., by and through their undersigned counsel, and pursuant to the Court's January 30, 2007 Order, hereby serve their Response to Plaintiff's Second Request for Production and specifically requests numbers 1 and 2, and would state as follows:

REQUEST FOR PRODUCTION NO. 1:

Copies of the e-mails, facsimiles, and/or letters received by Defendant (including but not limited to Lynn Martenstein, Michael Sheehan, and Linda Katz) from Alan Wilson and/or Cruise News Daily and/or www.cruisewebdaily regarding plaintiff.

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

Attached.

REQUEST FOR PRODUCTION NO. 2:

Copies of the e-mails, facsimiles, and/or letters sent by Defendant (including but not limited to Lynn Martenstein, Michael Sheehan, and Linda Katz) to Alan Wilson and/or Cruise News Daily and/or www.cruisewebdaily regarding plaintiff.

Laurie Dishman vs. Royal Caribbean Cruise, LTD.
Response to Plaintiff's Initial Request for Production Pursuant to Court Order
Case No. 06-15089 CA 04
Page 2

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

Attached.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true copy of the foregoing was served via facsimile and U.S. Mail to: James M. Walker, Walker & O'Neill, P.A., Plaza 57, 7301 SW 57th Court, Suite 430, Miami Florida, 33143, on this 16th day of February, 2007.

MALTZMAN FOREMAN, P.A.

Attorneys for Defendant, NCL

One Biscayne Tower, Suite 2300

2 South Biscayne Boulevard

Miami, Florida 33131

Telephone: (305) 358-6555/Fax: (305) 374-9077

By:


AMANDA L. JACOBS

Florida Bar No. 0846031

DARREN W. FRIEDMAN

Florida Bar No. 0146765

[6992 ON YR/XL] 92:5T JNL 2002/ST/Z0

Michael
Sheehan/CRPCM/MIA/RCL
08/17/2006 07:56 PM

To "Alan Wilson-CND" <awilson@cruisenewsdaily.com>
cc
bcc
Subject Re: Dishman request

Let's see what we can do tomorrow!!!!!!!!!!!!

If you don't hear from me first - call me by 11 a.m.

Michael J. Sheehan
Director, Corporate Communications
Royal Caribbean Cruises Ltd.
Phone: 305-539-6572 Fax: 305-536-0140
E-mail: msheehan@rccl.com

"Alan Wilson-CND" <awilson@cruisenewsdaily.com>



"Alan Wilson-CND"
<awilson@cruisenewsdaily.c
om>
08/17/2006 07:48 PM

To MSheehan@rccl.com
cc
Subject Re: Dishman request

Can you get it Friday? I held up the story again. I realized I wanted something else from the FBI on dates too. I really want to nail this woman - and the ICV.

Subject: Re: Dishman request
To: "Alan Wilson-CND" <awilson@cruisenewsdaily.com>
From: MSheehan@rccl.com
Date sent: Thu, 17 Aug 2006 19:36:34 -0400

> I just can't say - and everyone else - the smart ones -
> are gone now.
> Sorry!!!!!!!!!!!!

>
> Michael J. Sheehan
> Director, Corporate Communications
> Royal Caribbean Cruises Ltd.
> Phone: 305-539-6572 Fax: 305-536-0140
> E-mail: msheehan@rccl.com

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"Alan Wilson-CND"
<awilson@cruisene
wsdaily.com>

To

P.07/09

JAN-25-1996 22:17

02/13/2007 TUE 16:26 [899L ON YR/XL] TX/RX NO 7668

Michael
Sheehan/CRPCM/MIA/RCL
08/14/2006 05:48 PM

To "Alan Wilson-CND" <awilson@cruisenewsdaily.com>
cc
bcc
Subject Re: Laurie Dishman

I don't think I got the question. I'm wading through e-mails and have to get to voice mails. Let's talk tomorrow.

It's good to be back - (I think.....?????)

Michael J. Sheehan
Director, Corporate Communications
Royal Caribbean Cruises Ltd.
Phone: 305-539-6572 Fax: 305-536-0140
E-mail: msheehan@rccl.com

"Alan Wilson-CND" <awilson@cruisenewsdaily.com>



"Alan Wilson-CND"
<awilson@cruisenewsdaily.c
om>

To msheehan@rccl.com

08/14/2006 10:46 AM

cc

Subject Laurie Dishman

Welcome back,

Did Lynn leave you my questions about Laurie Dishman?
I'd like to get that story wrapped up today or tomorrow
if we can.

Thanks

Alan

1699Z ON XR/XJ) SZ:ST ONL 2007/ET/ZO
02/13/2007 12:25

Michael
Sheehan/CRPCM/MIA/RCL
08/14/2006 08:07 PM

To "Alan Wilson-CND" <awilson@cruisenewsdaily.com>
cc
bcc
Subject Re: Laurie Dishman

I think I have the story - and yes - I need to change my message!!

Michael J. Sheehan
Director, Corporate Communications
Royal Caribbean Cruises Ltd.
Phone: 305-539-6572 Fax: 305-536-0140
E-mail: msheehan@rccl.com

"Alan Wilson-CND" <awilson@cruisenewsdaily.com>



"Alan Wilson-CND"
<awilson@cruisenewsdaily.c
om>
08/14/2006 05:51 PM

To MSheehan@rccl.com
cc
Subject Re: Laurie Dishman

Do you know her story or do I need to send you that too?

I left you a voicemail a few minutes ago. You need to change your message to say you aren't gone anymore.

Subject: Re: Laurie Dishman
To: "Alan Wilson-CND" <awilson@cruisenewsdaily.com>
From: MSheehan@rccl.com
Date sent: Mon. 14 Aug 2006 17:48:15 -0400

> I don't think I got the question. I'm wading through
> e-mails and have to
> get to voice mails. Let's talk tomorrow.
>
> It's good to be back - (I think.....?????)
>
> Michael J. Sheehan
> Director, Corporate Communications
> Royal Caribbean Cruises Ltd.
> Phone: 305-539-6572 Fax: 305-536-0140
> E-mail: msheehan@rccl.com
>
>
>
>
>
>

"Alan Wilson-CND"

02/13/2007 TUE 15:25 (TX/RX NO 7668)

Michael
Sheehan/CRPCM/MIA/RCL
08/16/2006 05:33 PM

To "Alan Wilson-CND" <awilson@cruisenewsdaily.com>
cc
bcc
Subject Re: Let's talk about Laurie Dishman

Here's our statement - sorry its so late in the day!!

Royal Caribbean Statement

On February 23, 2006, a female guest onboard *Vision of the Seas* alleged that a male crew member sexually assaulted her. Royal Caribbean immediately notified the FBI, provided medical assistance to the alleged victim, sealed the stateroom in question, and provided the FBI with all information requested. Royal Caribbean also assisted the alleged victim and her female traveling companion in departing the ship at the next port, as they requested.

On February 26, when docked in Los Angeles, 10 FBI agents boarded the ship and conducted a full investigation, including interviews of all parties involved and potential witnesses. Based on that investigation, no arrests were made and no one was charged with any crimes.

The company has also provided the alleged victim with additional requested information.

#####

Michael J. Sheehan
Director, Corporate Communications
Royal Caribbean Cruises Ltd.
Phone: 305-539-6572 Fax: 305-536-0140
E-mail: msheehan@rccl.com
"Alan Wilson-CND" <awilson@cruisenewsdaily.com>



"Alan Wilson-CND"
<awilson@cruisenewsdaily.c
om>

08/15/2006 02:18 PM

To msheehan@rccl.com
cc
Subject Let's talk about Laurie Dishman

Give me a call. I'm here for the duration now.

Alan
941-388-9317

02/13/2007 TUE 15:25 [TX/RX NO 7689]

Michael
Sheehan/CRPCM/MIA/RCL
08/17/2006 07:36 PM

To "Alan Wilson-CND" <awilson@cruisewebdaily.com>
cc
bcc
Subject Re: Dishman request

I just can't say - and everyone else - the smart ones - are gone now. Sorry!!!!!!

Michael J. Sheehan
Director, Corporate Communications
Royal Caribbean Cruises Ltd.
Phone: 305-539-6572 Fax: 305-536-0140
E-mail: msheehan@rccl.com

"Alan Wilson-CND" <awilson@cruisewebdaily.com>



"Alan Wilson-CND"
<awilson@cruisewebdaily.c
om>

08/17/2006 01:13 PM

To msheehan@rccl.com
cc
Subject Dishman request

I want to put one more definitive nail in this story.
Can you tell me when you received her request for the
info and when you sent it to her? Her press release was
dated Aug 8. I'd love for you to say you received the
request on Aug 7.

Thanks!

Alan

02/13/2007 TUE 15:25 [TX/RX NO 76689]
TOTAL P.09

Michael
Sheehan/CRPCM/MIA/RCL
08/18/2006 08:49 PM

To "Alan Wilson-CND" <awilson@cruisewebdaily.com>
cc
bcc
Subject Re: This is your Friday Dishman reminder

I'm really sorry!!!!!!!!!!!!!! My day was sucked away from me by other internal company business. As you can see - I'm still here getting caught up with normal stuff - and it my birthday!!
My apologized again!!!!!!!!!!!!!!

Michael J. Sheehan
Director, Corporate Communications
Royal Caribbean Cruises Ltd.
Phone: 305-539-6572 Fax: 305-536-0140
E-mail: msheehan@rcccl.com

"Alan Wilson-CND" <awilson@cruisewebdaily.com>



"Alan Wilson-CND"
<awilson@cruisewebdaily.com>
08/18/2006 10:15 AM

To msheehan@rcccl.com
cc
Subject This is your Friday Dishman reminder